

# **Exhibit 2**



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June 4, 2021

*HIGHLY CONFIDENTIAL – OUTSIDE COUNSELS’ EYES ONLY*

James J. Lukas  
 Greenberg Traurig LLP  
 77 W. Wacker Drive Suite 3100  
 Chicago, Illinois 60601

**Re: Chervon (HK) Ltd. et al. v. One World Technologies, Inc., et al., 1:19-cv-1293 (D. Del)**

**Dear James:**

Pursuant to the order of Magistrate Judge Fallon on May 27, 2021, please see the following hit counts for the following search terms, post global de-duplication.

<b>Term</b>	<b>Hits</b>	<b>Hits including Family Group</b>
Mower AND (safe* OR switch OR sensor OR control* OR lock* OR kill OR “shut off” OR “shut down”)	59,901	122,161
Ego AND (pat* OR mower OR blower OR “power equipment” OR safe* OR RY401* OR RY40LM* OR Ryobi OR “one world” OR techtronic OR homelite OR 463 OR 806 OR 686 OR 588 OR 805 OR 772 OR 176 OR 420)	8,254	13,326
Chervon AND (pat* OR mower OR blower OR “power equipment” OR safe* OR RY401* OR RY40LM* or Ryobi OR “one world” OR techtronic OR homelite OR 463 OR 806 OR 686 OR 588 OR 805 OR 772 OR 176 OR 420)	1,361	2,829
Safe* AND (switch OR sensor OR control* OR lock* OR release* OR assembl* OR kill OR “shut off” OR “shut down”)	39,188	83,150
*mower* AND (copy* OR compet* OR infring* OR pat* OR chervon OR ego OR echo OR hart OR “home depot” OR “THD” OR “HD” OR homedepot OR walmart OR “walmart” OR telescop* OR storage OR collaps* OR fold* OR redesign OR “re design” OR “next generation” OR “next gen” OR nextgen OR roadmap OR “road map”)	126,654	208,966



James Lukas  
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Best regards,

Damon Marcus Lewis

DML: